

1 JASON M. FRIERSON
United States Attorney
2 Nevada Bar Number 7709
3 KIMBERLY M. FRAYN
Assistant United States Attorney
4 501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
5 Tel: (702) 388-6336/Fax: (702) 388-6418
6 Kimberly.Frayn@usdoj.gov
Attorneys for the United States
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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 CHARLENE SCOTT,
16 Defendant.
17
18
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Case No. 2:15-cr-00193-KJD-PAL

**Stipulation To Continue
Government's Deadline To File A
Response To Defendant's Motion and
Motion Supplement for
Compassionate Release**
(ECF 95 and 98)

(First Request)

20 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
21 Frierson, United States Attorney, and Kimberly M. Frayn, Assistant United States
22 Attorney, counsel for the United States of America, and Madeline S. Lal, Assistant
23 Federal Public Defender, that the government's time to respond to the defendant's
24 Motion and Motion Supplement for Compassionate Release (ECF 95 and 98) shall be
25 extended to and including June 7, 2024, for the following reasons:
26

1 1. In January 2024, defendant filed a *pro se* motion for compassionate release.
2 ECF 95. In it, Charlene Scott (“Scott” or “defendant”) raised several reasons she believed
3 early release from custody was warranted. On May 7, 2024, the defense counsel filed a
4 supplement to the motion, along with an exhibit containing Scott’s husband’s medical
5 records. ECF 98 and 99.
6

7 2. The parties had already agreed that the government would have 14 days to
8 file a response, which would have made the government’s response due on or about May
9 21, 2024. However, as the Court is aware, Scott’s husband’s medical issues are alleged to
10 be extensive, and the government needs additional time to review and understand the
11 medical records provided by the defendant in support of her motion.
12

13 3. Additionally, counsel for the government has recently found out that she
14 will be out of the district from May 20 , 2024 through May 23, 2024 for work, and will be
15 on previously scheduled leave on May 24, 2024.
16

17 4. Accordingly, more time than the initially agreed upon is needed for the
18 government to review the pleadings and other relevant records, conduct any necessary
19 follow up investigation, and to research and draft an appropriate response.
20

21 5. The defendant is in BOP custody and does not object to the government’s
22 request. The parties agree to the extension of time.
23

24 6. This is the government’s first request to extend the filing deadline to file a
25 responsive pleading to relating to the defendant’s compassionate release request. The
26 parties have agreed that the government shall have up to and including June 7, 2024, in

1 which to file its response. The additional time requested herein is not sought for purposes
2 of delay, but merely to allow the government sufficient time to file its response.

3 DATED this 15th day of May, 2024.

4
5 RENE L. VALLADARES
6 Federal Public Defender

JASON M. FRIERSON
United States Attorney

7 */s/ Madeline S. Lal*

/s/ Kimberly M. Frayn

8 By _____
9 MADELINE S. LAL
Assistant Federal Public Defender

By _____
KIMBERLY M. FRAYN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3
4 UNITED STATES OF AMERICA,
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6 v.
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**FINDINGS OF FACT,
CONCLUSIONS OF LAW AND
ORDER**

9
10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore,
12 the Court finds that:

13 1. In January 2024, defendant filed a pro se motion for compassionate release.
14 ECF 95. In it, Charlene Scott (“Scott” or “defendant”) raised several reasons she believed
15 early release from custody was warranted. On May 7, 2024, the defense counsel filed a
16 supplement to the motion, along with an exhibit containing Scott’s husband’s medical
17 records. ECF 98 and 99.

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19 2. The parties had already agreed that the government would have 14 days to
20 file a response, which would have made the government’s response due on or about May
21 21, 2024. However, as the Court is aware, Scott’s husband’s medical issues are alleged to
22 be extensive, and the government needs additional time to review and understand the
23 medical records provided by the defendant in support of her motion.
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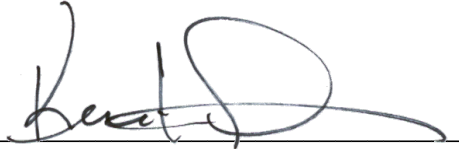
7 5. The defendant is in BOP custody and does not object to the government's
8 request. The parties agree to the extension of time.

9 6. This is the government's first request to extend the filing deadline to file a
10 responsive pleading to relating to the defendant's compassionate release request. The
11 parties have agreed that the government shall have up to and including June 7, 2024, in
12 which to file its response. The additional time requested herein is not sought for purposes
13 of delay, but merely to allow the government sufficient time to file its response.
14
15

16 **ORDER**

17 THEREFORE, IT IS HEREBY ORDERED that the government shall have up
18 to and including June 7, 2024 in which to file its response to the Defendant's motion
19 and motion supplement for compassionate release (ECF 95, 98, and 99).
20

21 DATED this 15th day of May, 2024.

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23 
24 HONORABLE KENT J. DAWSON
25 United States District Judge
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